

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

RED RIVER TALC LLC,¹

Debtor.

Chapter 11

Case No. 24-90505 (CML)

**DEBTOR'S WITNESS AND EXHIBIT LIST
FOR HEARING ON JANUARY 16, 2025**

The above-captioned debtor (the “Debtor”) files its Witness and Exhibit List for the hearing to be held on January 16, 2025, at 2:00 p.m. (prevailing Central Time) (the “Hearing”) before the Honorable Judge Christopher M. Lopez, United States Bankruptcy Judge, Courtroom 401, 515 Rusk Street, Houston, Texas 77002 as follows:

WITNESSES

The Debtor may call the following witnesses at the Hearing:

1. Any witness called by any other party;
2. Impeachment witnesses as necessary;
3. Any witness necessary to rebut testimony of a witness called or designated by any party.

¹ The last four digits of the Debtor’s taxpayer identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

EXHIBITS

EXHIBIT NO.	DESCRIPTION	MARK	OFFER	OBJECTION	ADMIT	W/D	DISPOSITION
1.	Dec. 4, 2024 email from D. Prieto to A. Silverstein, attached as Exhibit A to the <i>Emergency Motion of Debtor to Strike the Coalition's Designation of Five Medical, Science, and Regulatory Experts</i> [Dkt. 769] (the “Motion to Strike”) [Dkt. 769-1]						
2.	Dec. 10, 2024 Hearing Transcript, attached as Exhibit B to the Motion to Strike [Dkt. 769-2]						
3.	Excerpts from the <i>Disclosure Statement for Prepacked Chapter 11 Plan of Reorganization of the Debtor</i> , attached as Exhibit A to the Debtor’s reply in support of the Motion to Strike [Dkt. 918] (the “Reply”) [Dkt. 918-1]						
4.	Expert Report of David A. Kessler, M.D. in Connection With Prepackaged Chapter 11 Plan of Reorganization of the Debtor, attached as Exhibit B to the Reply [Dkt. 918-2]						
5.	Expert Report of Judith Wolf, M.D., attached as Exhibit C to the Reply [Dkt. 918-3]						
6.	Expert Report of Rebecca Smith-Bindman, MD, attached as Exhibit D to the Reply [Dkt. 918-4]						
7.	Expert Report of Roberta B. Ness, MD, MPH, attached as Exhibit E to the Reply [Dkt. 918-5]						
8.	Expert Report of William M. Sage, M.D., J.D. in Connection With Prepackaged Chapter 11 Plan of Reorganization of the Debtor, attached as Exhibit F to the Reply [Dkt. 918-6]						
9.	June 24, 2024 Letter from Levin Papantonio Rafferty to Clients, attached as Exhibit G to the Reply [Dkt. 918-7]						

EXHIBIT NO.	DESCRIPTION	MARK	OFFER	OBJECTION	ADMIT	W/D	DISPOSITION
10.	June 24, 2024 Letter from Levin Papantonio Rafferty to Clients, attached as Exhibit H to the Reply [Dkt. 918-8]						
11.	Open Letter From the Ad Hoc Committee of Supporting Counsel to All Holders of Channeled Talc Personal Injury Claims, attached as Exhibit I to the Reply [Dkt. 918-9]						
12.	Expert Report of Andrew R. Evans, CFA, attached as Exhibit J to the Reply [Dkt. 918-10]						
13.	Debtor's Expert Disclosures						
14.	The Coalition of Counsel for Justice for Talc Claimants' Expert Disclosures						
15.	Debtor's Rebuttal Expert Disclosures						
16.	<i>Disclosure Statement for Ninth Amended Joint Chapter 11 Plan of Reorganization of Imerys Talc America, Inc. and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code, In re Imerys Talc Am. Inc., Case No. 19-10289 (LSS) (Bankr. D. Del. Jan. 18, 2021), Dkt. 2866</i>						
17.	<i>Disclosure Statement for Second Joint Plan of Reorganization of Imerys Talc America, Inc. and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code, In re Imerys Talc Am. Inc., Case No. 19-10289 (LSS) (Bankr. D. Del. Nov. 5, 2024), Dkt. 6733</i>						
	Any document, pleading, exhibits, transcripts, orders or other documents filed in the above-captioned bankruptcy case						
	Any exhibit necessary for impeachment and/or rebuttal purposes						
	Any exhibit identified or offered by any other party						

RESERVATION OF RIGHTS

The Debtor reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the Hearing.

Dated: January 15, 2025
Houston, Texas

Respectfully submitted,

/s/ John F. Higgins

John F. Higgins (TX 09597500)
M. Shane Johnson (TX 24083263)
Megan Young-John (TX 24088700)
James A. Keefe (TX 24122842)
PORTER HEDGES LLP
1000 Main Street, 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Facsimile: (713) 228-1331
jhiggins@porterhedges.com
sjohnson@porterhedges.com
myoung-john@porterhedges.com
jkeefe@porterhedges.com

Gregory M. Gordon (TX 08435300)
Dan B. Prieto (TX 24048744)
Brad B. Erens (IL 06206864)
Amanda Rush (TX 24079422)
JONES DAY
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
dbprieto@jonesday.com
bberens@jonesday.com
asrush@jonesday.com

PROPOSED ATTORNEYS FOR DEBTOR

Certificate of Service

I certify that on January 15, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtor's claims, noticing and solicitation agent.

/s/ John F. Higgins

John F. Higgins